

Hon. David G. Estudillo

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FLEXIWORLD TECHNOLOGIES INC.,

Plaintiff,

v

AMAZON.COM INC. et al.,

Defendants.

No. 2:21-cv-01055-DGE

JOINT STATUS REPORT

Pursuant to Federal Rules of Civil Procedure 26(f) and Local Rule 26 and the Court's July 8, 2022 Order (Dkt. No. 122), the parties hereby submit the following Joint Status Report.

1. This is an action for patent infringement under 35 U.S.C. § 271, in which Plaintiff Flexiworld Technologies Inc., ("Flexiworld") asserts that Defendants Amazon.com Inc, Amazon.com LLC, Amazon.com Services, Inc., ("Amazon") infringe various claims of U.S. Patent Nos. 8,332,521, 8,989,064, 9,110,622, 10,133,527, 10,140,072, 10,162,596, 10,387,087, 10,481,846, 10,489,096, and 10,642,576 (collectively, the "Patents-in-Suit"). This case was initially brought in the U.S. District Court for the Western District of Texas ("WDTX") but was transferred to this District pursuant to an August 2, 2021 Order (Dkt. No. 98).

1           2.       Prior to the transfer, the parties fully briefed the disputed claim  
2 construction issues. The parties briefing is at ECF Nos. 53 (Plaintiff's Opening Brief), 57  
3 (Defendant's Responsive Brief), 58 (Plaintiff's Reply Brief), 61 (Defendant's Surreply  
4 Brief). In addition, Judge Albright in the WDTX issued preliminary claim constructions  
5 and held a claim construction hearing on January 29, 2021. However, Judge Albright did  
6 not issue a formal claim construction order. As such, the parties propose, subject to  
7 agreement by the Court, that this matter be set for a claim construction hearing at the  
8 Court's convenience so the parties may argue their respective positions before this Court  
9 and this Court can thereafter issue a formal claim construction order. The parties  
10 respectfully request a 2-hour hearing with the time to be evenly split between the parties.

11           3.       To the extent the Court believes it would be helpful, the parties are also  
12 willing to present a technical tutorial to the Court, either in conjunction with or in advance  
13 of the claim construction hearing, on a date and at a time convenient for the Court.

14           4.       The parties further agree, subject to agreement by the Court, to stay  
15 discovery in this matter until the issuance of a claim construction order. Following the  
16 issuance of a claim construction order, the parties would submit a proposed schedule for  
17 remaining case deadlines through trial.

DATED this 29th day of July 2022.

/s/ Tyler L. Farmer

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